



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

September 2, 2009

Ms. Adrienne Coleman
Superintendent
Rock Creek Park
3545 Williamsburg Lane, NW
Washington, DC 20008

Subject: Draft White Tailed Deer Management Plan, Environmental Impact Statement, Rock Creek Park, Washington, DC July 2009 (CEQ # 20090252)

Dear Ms. Coleman:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the United States Environmental Protection Agency (EPA) has reviewed the subject document. The purpose of the Draft Environmental Impact Statement (DEIS) is to develop a deer management strategy that supports long-term protection, preservation, and restoration of native vegetation and other natural and cultural resources at Rock Creek Park. Sampling conducted 2007 indicated 82 deer per square mile in the park.

The DEIS evaluates four alternatives. Under Alternative A (no action), the existing deer management plan of monitoring, data management, research, and use of protective caging and repellents in landscaped areas would continue. Under Alternative B, several non-lethal actions, such as large-scale enclosures, and reproductive controls of does via sterilization and an acceptable reproductive control agent when feasible would be taken to protect forest seedlings, promote forest regeneration, and gradually reduce deer numbers in the park. Under Alternative C, direct reduction of the deer heard would be achieved by sharpshooting and by capture and euthanasia of individual deer in certain circumstances where sharpshooting would not be appropriate. Alternative D (preferred alternative) would combine elements from Alternative B and C: sharpshooting and capture/euthanasia would be used initially to quickly reduce the deer herd numbers, followed by population maintenance via reproductive control methods if these are available and feasible; if not, sharpshooting would be used as a default option for maintenance.

According to the DEIS approximately half of the deer population (193 individuals) would be removed in the first year of implementation. This would reduce the population to 41 deer per square mile. The second year would remove approximately half the remaining population reducing the population to 25 deer per square mile. The third year would remove half the remaining population reaching the goal of 15 deer per square mile. Future deer removal will follow an adaptive management plan and would depend upon results of the deer population levels and monitoring.



Based on our review, we rate this DEIS, Lack of Objections (LO). A description of our rating system can be found at <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

We recommend that you continue to coordinate with the appropriate state and federal agencies regarding deer management issues. In addition, clarification should be provided regarding the distance of known Chronic Wasting Disease (CWD) from the Park. For example, page 46 states that CWD is greater than 100 miles from the park and page 287 states that it is 90 miles away.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Ms. Barbara Okorn at (215)814-3330.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

